

**AFFIDAVIT OF
LATANYA BARBER THOMAS**

IN THE CHANCERY COURT OF TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

PATRICE JORDAN ROBINSON
GREATER MEMPHIS DEMOCRATIC CLUB, *et al.*

Plaintiffs,

vs.

DOCKET NO:

SHELBY COUNTY ELECTION COMMISSION
LINDA PHILLIPS, in her official capacity as
Administrator of the Shelby County Election
Commission, STEVE STAMSON, ANTHONY TATE,
MATT PRICE, BENNIE SMITH, AND
BRENT TAYLOR, in their official capacities as
Members of the Board of Commissioners of the
the Shelby County Election Commission,

AFFIDAVIT OF LATANYA BARBER THOMAS

1. My name is LaTanya Barber Thomas. I am an African American, over the age of 18 years old, and I am a resident of Memphis, Shelby County, Tennessee.
2. I am currently working as a campaign worker for the Greater Memphis Democratic Club at Raleigh United Methodist Church, 3295 Powers Road, Memphis, Tennessee. I plan to work there during the October 3, 2019 City of Memphis Municipal Office Election, and I am working there during the early voting period, September 12, 2019 through until September 28, 2019.
3. As a campaign worker, I'm responsible for passing out candidates' political literature while at the polling location.
4. When I work as a campaign worker, I am required to work at the location that houses the polling places from 11:00 a.m. until 7:00 p.m., each and every weekday I work as a campaign worker during the early voting period and from 10:00 a.m. until 4:00 p.m.

on weekends and on election day, I work from 7:00 a.m. until 7:00 p.m. on election day.

5. Prior to working as a campaign worker, I was provided with written instructions and rules that apply to, and which I am required to follow, at the polling location where I am assigned, and the election is being held.
6. I was told that I needed to look for a marker placed at election locations which will let me know the area where campaign workers are prohibited from placing signs, campaign signs, bumper stickers, posters, literature, or campaigning or engaging in political activity is I was told it was not allowed within this 100 foot area or in the building where elections are held.
7. I was informed that I must wear clothing that covers up my political t-shirt before entering a building where voting is taking place and I that I was not to engage in political activity or speak to anyone when I go outside of the area where I hand out campaign literature.
8. On September 21, 2019, I attempted to use the restroom at Raleigh United Methodist Church but was not allowed to enter the building.
9. When I attempted to use the restroom at Raleigh United Methodist Church, I had no intention of entering the locations where elections were held. I did not carry signs, bumper stickers, posters, literature, or display any article of clothing that advocated for or against any candidate or issue. I did not circulate petitions or engage in similar activity and did not speak to or engage with voters inside the building or within 100 feet of the polling place, in any way whatsoever when I attempted to use the restroom.

10. When I attempted to use the restroom at Raleigh Community Center on September 21, 2019, I was asked I was a campaign worker. When I responded yes, that is when I was told I could not use the restroom
11. Poll workers at Raleigh United Methodist Church walk to down the street KFC to use the restroom.

In witness whereof, I have hereunto subscribed my name on this 24 day of Sept, 2019.

LaTanya Barber Thomas
LaTanya Barber Thomas

STATE OF TENNESSEE
COUNTY OF SHELBY

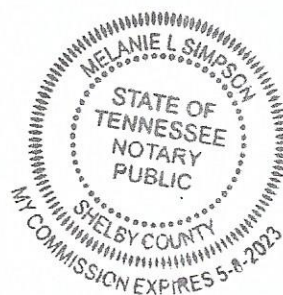
SWORN TO AND SUBSCRIBED BEFORE ME THIS 24 day of September 2019.

Melanie L Simpson

Notary Public

My commission expires:

5-8-2023



**AFFIDAVIT OF
JOHNSON SAULSBERRY, III**

IN THE CHANCERY COURT OF TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

PATRICE JORDAN ROBINSON
GREATER MEMPHIS DEMOCRATIC CLUB, *et al.*

Plaintiffs,

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AFFIDAVIT OF JOHNSON SAULSBERRY III

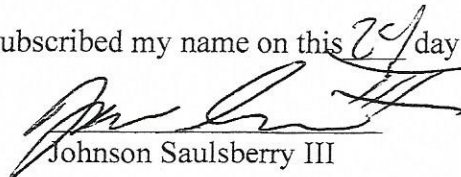
1. My name is Johnson Saulsberry III. I am an African American, over the age of 18 years old, and I am a citizen and resident of Memphis, Shelby County, Tennessee. I suffer with a disabling condition, namely, Sickle Cell Anemia.
2. I am currently working as a campaign worker for the Greater Memphis Democratic Club. I work at two polling locations, Glenview community Centre, 1141 S. Barksdale St, Memphis, Tennessee, and Greater Middle Baptist Church, 4982 Knight Arnold Road, Memphis, Tennessee. I plan to as a campaign worker during the October 3, 2019 City of Memphis Municipal Office Election, and I am working as a campaign worker during the early voting period, September 12, 2019 through until September 28, 2019. The campaign workers at the polling locations where I am assigned are African American.

3. As a campaign worker, I'm responsible for passing out candidates' political literature while at the polling location.
4. When I work as a campaign worker, I am required to work at the polling locations for limited hours, due my disability. Early voting locations where I am assigned are open from 11:00 a.m. until 7:00 p.m., each and every weekday, during early voting period and from 10:00 a.m. until 4:00 p.m. on weekends. On election day, polling locations are open 7:00 a.m. until 7:00 p.m. on election day.
5. Prior to working as a campaign worker, I received instructions and rules that apply to, and which I am required to follow, at the polling location where I am assigned, and the election is being held and I am familiar with these instructions.
6. I am aware that I must look for a marker placed at election locations which will let me know the area where campaign workers are prohibited from placing signs, campaign signs, bumper stickers, posters, literature, or campaigning or engaging in political activity. I am aware that I am not allowed to engage in political activity within this 100-foot area or in the building where elections are held.
7. I am aware that I must wear clothing that covers up my political t-shirt before entering a building where voting is taking place and I that I am not to engage in political activity or speak to anyone if I go outside of the area where I hand out campaign literature.
8. If allowed to use the restrooms at the polling locations where I am assigned, I have no intention of entering the polling and will not carry signs, bumper stickers, posters, literature, or display any article of clothing that advocates for or against any candidate or issue. I will not circulate petitions or engage in similar activity will not speak to or

engage with voters inside the building or within 100 feet of the polling place, in any way whatsoever, if allowed to use the restroom.

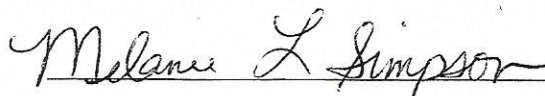
9. Campaign workers where I work are not allowed to use the restroom and are forced to look for some other location that will allow them to use the restroom. and this causes a hardship for me due to my condition.

In witness whereof, I have hereunto subscribed my name on this 24 day of Sept, 2019.


Johnson Saulsberry III

STATE OF TENNESSEE
COUNTY OF SHELBY

SWORN TO AND SUBSCRIBED BEFORE ME THIS 24 day of September, 2019.



Notary Public

My commission expires:

2023

